

**DEPARTMENT OF CONSUMER AFFAIRS
BOARD OF PSYCHOLOGY**

INITIAL STATEMENT OF REASONS

Hearing Date: February 10, 2007

Subject Matter of Proposed Regulations: Supervised Professional Experience for Trainees Preparing for Practice in Non-Mental Health Services

Section Affected: 1387.3

Specific Purpose of each adoption, amendment, or repeal:

Currently, section 1387.3 does not provide adequate guidelines on how a trainee preparing for practice in non-mental health services can accrue the 3000 hours of supervised professional experience required for licensure. This proposed regulation would further define and make specific the criteria for accruing supervised professional experience for those trainees preparing to practice in non-mental health services.

The purpose of these current proposed amendments is to update how the regulations approach the training of psychologists in non-mental health. SPE is the primary method by which psychology trainees gain the practice skills to apply in their practice of psychology.

Further, the purpose of these regulations is to foster clear communication between supervisors, trainees and training programs. Misunderstandings of expectations, goals and objectives and limitations in the supervised experience setting are common problems that often get in the way of quality training experiences. These proposals will remove restrictions which impair training goals. These proposals will also require supervisors and trainees to develop a document which clearly spells out goals and objectives of the experience and other information that often is ignored or misunderstood. These proposals will directly enhance consumer protection in the training setting and they will enhance the overall training experience by facilitating clear communication of expectations between supervisors, trainees and training programs.

The proposals are genuine efforts to remove bureaucratic barriers inherent in the current regulations and to substantially increase the clarity of the language to ensure that those affected by the regulations for supervised professional experience in non-mental health services can understand the language and comply with the direction it provides.

Factual Basis/Rationale

New language has been added to clarify that a plan must be submitted to the board and approved before any experience will be counted toward supervised professional

experience for licensure. Over the past few years it has come to the board's attention that more and more applicants for licensure as a psychologist are not going into clinical practice, rather, they are preparing for practice in non-mental health settings. Currently, the regulations relating to supervised professional experience (SPE) for trainees preparing for such practice are vague and lack the necessary guidelines needed to accrue the mandatory SPE. Sections 1387, 1387.1 and 1387.2 are geared towards individuals accruing SPE in mental health settings making it difficult for individuals who wish to practice in non-mental health areas of psychology to accrue SPE in the areas in which they wish to practice. This discourages many individuals from pursuing licensure in the State of California. Those individuals who choose not to become licensed can perform services that do not require licensure or work in exempt settings. This creates a shortage of qualified licensed psychologists to perform non-mental health services in private settings or even in exempt settings which may require that these types of services be performed by licensed professionals. The proposed changes provide structure for those individuals who are accruing SPE in non-mental health settings.

The board formulated the proposed amendments to the regulations regarding supervised professional experience in non-mental health services.

The factual basis of each amendment is provided in the order in which the amendment appears in the proposed language:

1. Throughout these proposals are various non-substantive edits of grammar, punctuation and of clarification of wording.
2. The second paragraph makes a clear statement that trainees accruing hours in SPE in non-mental health must submit a plan to the board prior to the commencement of supervision.
3. The new subsection (a) defines the supervision plan.
4. The new subsection (b) defines existing time limits for accruing hours of experience and the requirements under which SPE can be accrued.
5. The new subsection (c) defines the supervision requirements for each trainee in non-mental health services as they do not currently exist.
6. The new subsection (d) defines qualifications and responsibilities of the primary supervisor. Currently, these requirements are not specified in regulation, thereby causing confusion for the supervisors and trainees.
7. The new subsection (e) defines qualifications and responsibilities of delegated supervisors. Currently, these requirements are not specified in regulation, thereby causing confusion for the supervisors and trainees.
8. The new subsection (f) defines the qualifications and responsibilities of co-supervisors, which only applies when the primary supervisor is not licensed.

Underlying Data

N/A

Business Impact

This regulation will not have a significant adverse economic impact on businesses.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.